

EXHIBIT 1

From: [Wohlgemuth, Stephen](#)
To: [Butts, John](#); [Ellsworth, Felicia H](#)
Subject: RE: Settlement Communications
Date: Thursday, July 20, 2023 6:21:21 PM

EXTERNAL SENDER

We're going to hold on the materials that Judge Phillips is objecting to right now.

We do want to raise the a/c privilege issue separately and earlier. Are you free tomorrow for court call to ask a briefing schedule on that?

Stephen Wohlgemuth
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From: Butts, John <John.Butts@wilmerhale.com>
Sent: Wednesday, July 19, 2023 11:37 PM
To: Wohlgemuth, Stephen <SWohlgemuth@wc.com>; Tuttle Newman, Jake <Jacob.TuttleNewman@wilmerhale.com>; Schiffmann, Eden <ESchiffmann@wc.com>; Warren, Zach <ZWarren@wc.com>; Bayerl, Joseph <JBayerl@wc.com>; Thompson, Kees <KeesThompson@wc.com>; Dunn, J.J. <jdunn@wc.com>
Cc: WHJPMCSservice <WHJPMCSservice@wilmerhale.com>
Subject: RE: Settlement Communications

We obviously disagree on the objections. Let me circle up with the others on a time for a call. We'll get back to you in the am.

From: Wohlgemuth, Stephen <SWohlgemuth@wc.com>
Sent: Wednesday, July 19, 2023 9:33 PM
To: Tuttle Newman, Jake <Jacob.TuttleNewman@wilmerhale.com>; Schiffmann, Eden <ESchiffmann@wc.com>; Warren, Zach <ZWarren@wc.com>; Bayerl, Joseph <JBayerl@wc.com>; Thompson, Kees <KeesThompson@wc.com>; Dunn, J.J. <jdunn@wc.com>
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EXTERNAL SENDER

Counsel:

The objections based on the "mediation/settlement privilege" are completely baseless. Let's call the Court tomorrow at 4 to raise the issue. We will also raise the letter brief on the attorney-client privilege issues. As I have mentioned, we will need a reply.

Thanks.

From: Tuttle Newman, Jake

<Jacob.TuttleNewman@wilmerhale.com<mailto:Jacob.TuttleNewman@wilmerhale.com>>

Date: Friday, Jul 14, 2023 at 10:07 PM

To: Wohlgemuth, Stephen <SWohlgemuth@wc.com<mailto:SWohlgemuth@wc.com>>, Schiffmann, Eden <ESchiffmann@wc.com<mailto:ESchiffmann@wc.com>>, Warren, Zach

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Subject: Settlement Communications

Counsel –

Attached please find two logs reflecting documents responsive to the Court’s May 7, 2023 Order (docketed on May 13) that JPMC is withholding on the basis of privilege. These logs are designated “Confidential / Not to be shared with USVI.”

The first attachment—WH External Communications Log—reflects communications between Counsel for JPMC, Counsel for the Jane Doe 1 Class, and Mediator Layn Phillips. These documents are being withheld under the mediation/settlement privilege based on the objections of Judge Phillips and Counsel for the class.

The second attachment—S. Friedman Privilege Log—reflects documents from the custodial file of JPMC General Counsel Stacey Friedman related to the settlement that are withheld on the basis of Attorney-Client Privilege and Attorney Work Product Protections.

Best,

Jake

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